

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
Fieldwood Energy III LLC, <i>et al.</i> ,	§	Case No. 20-33948 (MI)
Post-Effective Date Debtors ¹ .	§§	Chapter 11
	§§	Jointly Administered

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND
RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S OBJECTION TO
MARUBENI OIL & GAS (USA) LLC'S PROOFS OF CLAIM**

[Relates to Docket Nos. 2843, 2895, 2989, 3017]

This Stipulation and Agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]²; and (ii) Marubeni Oil & Gas (USA) LLC (“**MOGUS**”) regarding the Plan Administrator’s Objection to MOGUS’s Proofs of Claim [Docket No. 2843] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 25, 2020, MOGUS timely filed separate proofs of claim identified as Claim Numbers 726 and 728 (collectively, the “**MOGUS Proofs of Claim**”).

WHEREAS, the Plan Administrator filed his Objection on August 17, 2023, which included a response date of September 15, 2023, and a hearing on October 2, 2023, at 10:30 AM CST.

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

WHEREAS, on September 13, 2023, the Court entered the Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Plan Administrator's Objection to Proofs of Claim Filed by Marubeni Oil & Gas (USA) LLC (Docket No. 2895) re-setting the hearing on the Objection to January 24, 2024, at 9:00 AM CST and extending MOGUS's deadline to respond to the Objection to and through Wednesday, December 13, 2023.

WHEREAS, on December 12, 2023, the Court entered the Second Stipulation and Agreed Order Extending Marubeni Oil & Gas (USA) LLC's Deadline to Respond to Plan Administrator's Objection to Proofs of Claim (Docket No. 2989) extending MOGUS's response deadline to and through Friday, December 22, 2023.

WHEREAS, on December 26, 2023, the Court entered the Third Stipulation and Agreed Order Extending Marubeni Oil & Gas (USA) LLC's Deadline to Respond to Plan Administrator's Objection to Proofs of Claim (Docket No. 3017) extending MOGUS's response deadline to and through Wednesday, January 10, 2024.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation further extending MOGUS's response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. MOGUS's deadline to respond to the Objection is extended to and through **Tuesday, March 12, 2024**, subject to further extensions based on the Parties' agreement.
2. The initial pre-trial hearing on the Objection is reset to **Thursday, March 21, 2024, at 1:30 p.m. CST**.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

IT IS SO ORDERED

Dated: _____

UNITED STATES BANKRUPTCY JUDGE
MARVIN ISGUR

**BOND ELLIS EPPICH SCHAFFER JONES LOOPER GOODWINE P.C.
LLP**

/s/ Aaron Guerrero

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**ATTORNEYS FOR MARUBENI OIL
& GAS (USA) LLC**

**ATTORNEYS FOR DAVID DUNN, PLAN
ADMINISTRATOR FOR THE POST-
EFFECTIVE DATE DEBTORS**

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January, 2024 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron Guerrero
Aaron Guerrero